

**PRESENTMENT DATE AND TIME: March 9, 2010 noon (Eastern Time)**  
**OBJECTION DEADLINE: March 9, 2010 at 11:30am (Eastern Time)**

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**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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x :  
**In re:** : **Chapter 11**  
: :  
**MOTORS LIQUIDATION COMPANY, et al.,** : **Case No. 09-50026**  
    **f/k/a General Motors Corp., et al.,** :  
        **Debtors** : **(Jointly Administered)**

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**REPLY OF MOVANT SARAJUAN GILVARY TO OBJECTION  
OF RESPONDENT POMPEY DODGE TO PROPOSED ORDER RULING ON  
MOTION TO LIFT AUTOMATIC STAY (DOCUMENT NO's 4541)**

Movant never agreed to remove Paragraph 4 of the proposed Order. The undersigned at one point during e-mail dialogue over the language of the proposed Order proposed to remove the Paragraph as redundant to other language, if Respondent agreed to the other alternative language elsewhere in the proposed Order. Respondent did not agree to the alternative language but instead raised a new objection that it had not previously raised. Accordingly, any claim that the undersigned agreed to remove Paragraph 4 is misleading. Finally, Respondent has failed to articulate how Paragraph 4 in any way deviates from the Court's rulings on the Motion.

Dated: New York, New York

March 9, 2010

/s/ Eric G. Zajac, Esquire  
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